



**VIA ELECTRONIC FILING**

July 26, 2017

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20054

**Re:** *Notice of Ex Parte Meeting Regarding Advanced Methods to Target and Eliminate Unlawful Robocalls;*  
*CG Docket No. 17-59*

Dear Ms. Dortch:

On July 26, 2017, Joseph Habib, Associate Counsel and Nicole Ehrbar, Vice President of Public Policy, from Quicken Loans met with Zenji Nakazawa, Legal Advisor with Federal Communications Commission (the “FCC” or “Commission”) Chairman Pai to discuss the *Notice of Proposed Rulemaking* and *Notice of Inquiry* on Advanced Methods to Target and Eliminate Unlawful Robocalls.<sup>1</sup>

**Background**

Detroit-based Quicken Loans Inc. is the nation’s second largest retail home mortgage lender and the largest and consistently highest-quality Federal Housing Administration (“FHA”) mortgage lender. The company closed more than \$220 billion of mortgage volume across all 50 states since 2013, and we have over 1.1 million mortgage servicing clients. Quicken Loans generates loan production from web centers located in Detroit, Cleveland and Scottsdale, Arizona. The company also operates a centralized loan processing facility in Detroit, as well as its San Diego-based One Reverse Mortgage unit. Quicken Loans ranked “Highest in Customer Satisfaction for Primary Mortgage Origination” in the United States by J.D. Power for the past six consecutive years, 2010 – 2015, and highest in customer satisfaction among all mortgage servicers in 2014 and 2015.

Quicken Loans was ranked No. 5 on FORTUNE magazine’s annual “100 Best Companies to Work For” list in 2016, and has been among the top-30 companies for the last 13 years. It has been recognized as one of Computerworld magazine’s ‘100 Best Places to Work in IT’ the past 11 years, ranking No. 1 in 2015, 2014, 2013, 2007, 2006 and 2005. The company moved its headquarters to downtown Detroit in 2010, and now more than 10,000 of its 15,000 team members work in the city’s urban core.

As an internet-based company, Quicken Loans does not follow the traditional “brick and mortar” model. We’ve proudly built an internet mortgage lending process that is dedicated to the best client experience possible. Our clients’ happiness is our #1 priority. Our successful, centralized business model relies heavily on our ability to transact business by telephone.

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<sup>1</sup> *Advanced Methods to Target and Eliminate Unlawful Robocalls*, FCC 17-24, CG Docket No. 17-59, FCC (2017)

### **NPRM/NOI Comments**

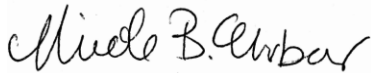
As discussed during the meeting, the FCC has begun to look at changing regulatory uncertainty around blocking fraudulent calls. Understanding the NPRM/NOI focus is blocking "Illegal Robocalls", we believe there is a need to concisely define the term "Robocall" as class action plaintiffs and courts will be looking to all FCC actions related to "robocalls" no matter what statute it falls under.

"Robocall" is a generic term that needs clarity, and should be clearly outlined so industry, consumers groups, and courts can understand what's included and what isn't. "Robocall" is a contraction of robotic call, and is most often discussed in the context of the TCPA. We believe a concise and appropriate definition of "robocall" is:

*"Any telephone call to a telephone number using an artificial voice or prerecorded message where a live person is not on the line and available to communicate with the intended recipient of the call at the time of connection to the telephone number called."*

### **Conclusion**

We thank the Commission for the opportunity to discuss these important issues and provide feedback. We look forward to a continued dialogue with the FCC as it examines how to how to stop bad actors and calls that harm the consumer and hurt business communications. Should you have any further questions, please contact me at [nicoleehrbar@quickenloans.com](mailto:nicoleehrbar@quickenloans.com) or 313-373-4950.



Nicole Ehrbar  
Vice President of Public Policy  
Quicken Loans

cc: Zenji Nakazawa